



RIEBLING & PAYTON
CRIMINAL DEFENSE AND FAMILY LAW

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November 1, 2023

BY ECF

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Joseph Maharaj*, 22 Cr. 18 (NSR) -01

Dear Judge Román:

As the Court will recall, my office represents the Defendant, Joseph Maharaj, in the above referenced matter which is presently scheduled for sentencing on January 25, 2024.

At this time, I am respectfully requesting that Mr. Maharaj be granted permission to travel to San Antonio, Texas from December 26, 2023 to January 1, 2024. This request is being made to allow Mr. Maharaj to travel with his son who was selected to be on a travel flag football team and the team is playing a tournament in San Antonio, Texas in December. Travel dates for the tournament are December 26, 2023 to January 1, 2024. Mr. Maharaj is requesting permission of the Court to travel to Texas and attend the tournament with his son.

I have previously contacted AUSA Stephanie Simon and Pretrial Officer Andrew Abbott regarding this request. Officer Abbott indicated that Pretrial Services would not object to the travel as long as it was approved by the Court and my client provided his flight and accommodations in advance of the travel dates. AUSA Simon has indicated that the Government would defer to Pretrial Services. Both are copied on this letter.

Accordingly, I am seeking the Court's permission and approval to allow my client to travel for the upcoming tournament. He is prepared to provide the necessary information for the trip as Pretrial Services requests.

Deft's request for a temporary bail modification permitting Mr. Maharaj to travel to San Antonio, Texas from Dec. 26, 2023 to Jan. 1, 2024 is GRANTED without objection by Pretrial Officer Abbott and the Gov't. Deft. is directed to provide his flight and accommodations information to Pretrial Officer Abbott in advance of the travel dates. Clerk of Court is requested to term. the motion at ECF No. 80.
Dated: White Plains, NY
November 1, 2023

SO ORDERED:

HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Respectfully Submitted,

/s/ Stephen J. Riebling, Jr.
STEPHEN J. RIEBLING, JR.
Attorney for Defendant Maharaj
Tel.: (914)705-4502

MEMO ENDORSED

Cc: Stephanie Simon, Assistant U.S. Attorney
Andrew Abbott, Pretrial Services Officer